

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

841 Chestnut Building Philadelphia, Pennsylvania 19107

AUG 15 1988

Jane Sulima 647 Welsh Road Philadelphia, PA 19115

Dear Ms. Sulima:

Thank you for your letter of August 1, 1988 regarding the C & D Superfund site. It is my understanding that you have remained in close contact with the Region III staff members assigned to this case, and that they have responded to many community concerns and technical comments. I have also reviewed the lengthy response to your 55 question letter dated March 19, 1988, directed to Senator John Heinz.

Based on my review of these documents, I am convinced that the Agency has responded fully to your concerns regarding the existing scope of investigation for the C & D Recycling Site in its April 28, 1988 letter from Ms. Donna McCartney, EPA Project Manager for this Remedial Investigation and Feasibility Study. This letter provided responses to the fifty-five comments on the Remedial Investigation Work Plan which you raised in your March 19 letter. Included in that response, and explained further during subsequent telephone conversations between Ms. McCartney and yourself, was EPA's description of the approach to the sampling and investigation of the shale pit area, additional work to be completed, if necessary to characterize the site fully.

Please be advised that, in accordance with the National Contingency Plan, EPA approved the Work Plan submitted by AT & T Nassau Metals Corporation for this project on May 25, 1988. A substantial amount of investigative work has already been completed both at and around the site. The Agency is confident that the existing Work Plan will obtain site data of sufficient quality and quantity to complete a characterization of the site. If, as in any RI/FS project, EPA identifies a need to conduct additional sampling and investigation to reach a technically acceptable decision on site remediation, such tasks would be completed in the normal course of this project.

While the C & D Recycling site and the Marjol Battery site in Throop, PA both have lead contamination, at this time there is little comparison between the two sites. To date, the C & D site has revealed distinct areas of highly contaminated materials, which have been covered and stabilized by EPA's emergency removal work. The Marjol site has numerous highly contaminated areas, one of which covers many acres and has a volume of thousands of cubic yards. The C & D site is presently undergoing an RI/FS. As part of this project, the potential for offsite contamination will be fully investigated. The Marjol Battery site has many serious off-site contamination problems causing significant levels of lead to be found in the immediate adjacent neighborhood. Because of the above characteristics, it was necessary for EPA to differ in its response to the two sites.

EPA's emergency removal program continues to monitor the effectiveness of the stabilization work at the C & D site. Should further problems become apparent, all necessary actions will be undertaken by EPA.

I am aware that your concerns about the C & D Superfund site are continually answered by our Region III employees. These people are dedicated to cleaning up the environment with full public involvement. I receive positive comments on a regular basis about the Superfund staff in the Philadelphia office, and that includes managers, community relations and technical personnel. This is true especially for the C & D case where we have received very positive feedback from the citizens group and the township officials.

If you have any further questions or comments, please contact Bill Draper at 215/597-6180.

Sincerely,

James M. Seif URegional Administrator